# Before the Federal Communications Commission Washington, D.C. **20554**

In the matter of	)		
Revision of the Commission's Rules To Ensure Compatibility with Enhanced <b>911</b>	)	CC Docket No. <b>94-102</b>	RECEIVED
Emergency Calling Systems	}		NOV 1 8 2002

Federal Communications Commission
Office of the Secretary

# Enhanced **911** Phase **II** Quarterly Report of Western Wireless Corporation

Western Wireless Corporation ("Western"), on behalf of its subsidiaries listed in Attachment A, and pursuant to the Federal Communications Commission's ("FCC") Order to Stay ("Order"), hereby submits its first Quarterly Report on its plans and progress for the deployment of Enhanced 911 ("E911") Phase II service.' According to the Order, Western is defined as a Tier II carrier for the purposes of E911 Phase II deployment because it had more than 500,000 subscribers as of the end of 2001.<sup>2</sup>

#### I. Introduction

Western provides Commercial Mobile Radio Service ("CMRS") in 19 states west of the Mississippi River and operates under the CellularOne brand name. Its network is comprised of equipment from multiple manufacturers and infrastructure providers, and it operates analog and digital CMRS on its network using both Lucent and Nortel equipment. Additionally, its network is available to accommodate roaming traffic from a wide assortment of carriers. Western has contracted with Intrado for assistance in

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<sup>&</sup>lt;sup>1</sup> See Revision of the Commission's Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems, CC Docket No. 94-102, Order to Stay, FCC 02-210 (2002).

deploying Phase 1 and Phase II services throughout its network, and Western will be using a handset-based solution – Assisted Global Positioning System ("AGPS") – to provide Phase II location information. On August 31, 2001, Western submitted its limited Petition for a waiver of the Commission's Phase II Rules.' In response to this and other carrier's waiver requests, the Commission issued its Order establishing the deployment reporting schedules for Tier 11 and Tier III carriers.

Western has already met the Commission's March 1, 2003 requirement to begin selling and activating location-capable handsets. It is working with its vendors to ensure the necessary switch upgrades are in place along with appropriate database and network links to the Mobile Positioning Center ("MPC") and Position Determination Equipment ("PDE'), by the later of March 1, 2003 or within six months of valid request(s). Western is coordinating with Public Safety Answering Points ("PSAPs") and Local Exchange Carriers ("LECs") on the necessary network upgrades that must be in place on the public network in order for Western's Phase II service to work successfully.

#### II. Network Deployment

In many of the jurisdictions in which Western operates, it is the Leading carrier undertaking Phase II deployment efforts. In order for Phase II service to work properly, many network elements must be improved and the entire network, from handset to PSAP, must be carefully coordinated to provide a seamless interface to carry the Phase II signal. Western has already begun the upgrade and coordination of its network, including handsets, cell sites, mobile switches, network facilities, PDE, and MPC. Likewise, Western is working closely with the LECs and PSAPs to ensure that the existing

<sup>&</sup>lt;sup>1</sup> See Western Wireless Corp., Petition For Waiver of Section 20.18(g), CC Docket 94-102 (filed Aug. 31, 2001).

emergency communications systems infrastructure will be capable of transporting and carrying the Phase II signal Western is preparing to send the PSAP. Western will briefly explain the steps it has taken to date to prepare its network to provide Phase II service.

In July, 2002, Western completed the software upgrades to its Nortel and Lucent Mobile Switching Centers ("MSCs") from which it will deliver service to the requesting PSAPs. In October, 2002, Western successfully completed its migration from the Intrado SCP to the Intrado MPC for its MSCs in Midland, Texas; Harlingen, Texas; Sioux Falls, South Dakota; and Salina, Kansas. Additional switches will soon be converted to the Intrado MPC. The MPC will act as the critical database necessary to provide Phase II service. The PDE Western will be using for its Phase II service was activated for service in October 2002. Additional coordinating work involving the MSC, MPC and PDE must still be done, and Western is progressing as planned to complete this work on time.

Western is currently selling the Audiovox 9155 handset with GPS capabilities to its customers and the public – well in advance of the March 1,2003 deadline. This handset includes the necessary GPS chipset which will allow it to calculate a latitude and longitude for its present location based upon communications with orbiting satellites. These handsets are compliant with the Commission's Phase II accuracy requirements. Additionally, Western will soon be offering the following location-capable handsets to its customers:

Audiovox 8500 Audiovox 9500 Motorola 120e Motorola 720c Nokia 3585i Kyocera 2325 Western's First Office Application ("FOA") for deployment and delivery of Phase II service will take place in Midland, Texas and will include the Midland Emergency Communications District ("Midland"). On November 7, 2002, Western and Midland will be participating in a joint planning session in Midland, Texas to prepare for this initial deployment. As part of this meeting, Western will brief Midland on the technological developments and the status of the network deployment of service. Also, Western will assess the readiness of the PSAP equipment and the LEC infrastructure supporting the PSAP. This analysis will be critical to the timing and the ultimate deployment of service.

In light of the critical nature of the LEC infrastructure, Western is aware of, and desires to bring to the attention of the FCC, certain obstacles that are looming which might significantly delay actual deployment of the service. For instance, Phase II service requires an additional Automatic Location Identification ("ALI") database upgrade to query the MPC at the time of a Phase 11911 call in order to successfully deliver the ALI data. Many of the ALI databases are operated by the LEC, and as Dale N. Hatfield's Report to the Commission regarding the technical and operational issues impacting the provision of wireless enhanced 91I services ("Hatfield Report") illustrates, most LECs have a great deal of work left to do in order to complete the necessary upgrades.<sup>4</sup>

Without such an upgrade to the ALI database, a wireless carrier cannot deliver

Phase II latitude and longitude information to the PSAF. The Commission's rules clearly
state that the PSAP is responsible for the upgrades to the ALI database.' The

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<sup>&</sup>lt;sup>4</sup> See Dale N. Hatfield, A Report on Technical and Operational Issues Impacting The Provision of Wireless Enhanced 911 Services, October 15, 2002.

<sup>&</sup>lt;sup>5</sup> Letter from Thomas J. Sugrue to Kathleen B. Levitz, BellSouth Corporation, et al., CC Docket No. 04-102, dated October 28, 2002; Letter from Thomas J. Sugrue, Chief, Wireless Telecommunications Bureau, to Marlys R. Davis, E911 Program Manager, King County, Washington, at I (May 7.2001). aff d on recon., FCC 02-146, CC Docket No. 94-102. (rel. July 24, 2002).

Commission established the input to the LEC Selective Router as being the demarcation point for determining which party should pay for any necessary upgrades. The ALI database is on the PSAP side of the demarcation point and as such the PSAP bears the cost required for any necessary ALI database upgrades. Many LECs have not yet been able to complete the necessary upgrades to the ALI databases that PSAPs use to receive 91 l calls. Until this changes, some PSAPs will not be able to receive and utilize the Phase [I] signal Western is preparing to send them. Furthermore, many PSAPs have not yet been able to execute a service agreement with the LEC regarding payment for the trunking and routing services the LEC will have to provide the PSAF' in order for a Phase II call to work successfully. Any further delay in completing these network upgrades to this vital element in the Phase II network will prevent deployment of service by the Commission's March 1, 2003, or six months from a PSAF request, whichever is later, deadline. Western believes it is critical the Commission fully understand these imminent obstacles and continue to take appropriate steps to help resolve these issues.

The rules governing E911 deployment require that a request for service is valid if a PSAP "is capable of receiving and utilizing the data elements associated with the service" as defined in the rules.' If the PSAF' has not timely ordered the necessary ALI database upgrades, then its request cannot be valid. The Commission's *Richardson*Order acknowledged that it is inefficient to require wireless carriers to waste valuable time attempting to deploy service in areas where the PSAP, because of its own unpreparedness and/or the LEC's, is not capable of receiving and utilizing the Phase II

6 Ia

<sup>&</sup>lt;sup>7</sup> 47 C.F.R. § 20.18(j)

information.<sup>8</sup> In spite of Western's best efforts to deploy E911 service in response to certain PSAP's requests, it might be unable to launch a successfully working system because of LEC network shortcomings and incomplete ALI database upgrades. The Commission must not hold such a failure to deploy service against Western.'

Nevertheless, Western has made every effort to work cooperatively with PSAPs in order to deploy service on time and in accordance with Commission rules, and will continue to do so.

Western has engaged each of the PSAPs facing such a potential LEC-related deployment delay and is communicating regularly with them to keep them apprised of the latest deployment status. In some instances, Western and the PSAP have reached an understanding on an alternative deployment agreement which takes into account the Commission's rules and the current situation surrounding the readiness of the vital network elements. These PSAPs have agreed to work cooperatively with Western to overcome any potential obstacles that might delay the deployment of service. A copy of the alternative deployment agreements for the following counties is attached under Attachment B: Gallatin County, Montana, and Pennington County, South Dakota.

#### III. Deployment Status

Western has received requests for delivery of Phase I E911 service from PSAPs in eleven of the 19 states in which it provides service. Western's Phase I deployment activity has steadily increased over the last few years, but new requests for service have leveled out in recent months. New requests for service appear to be concentrated in states

<sup>&</sup>lt;sup>8</sup> See Revision of the Commission's Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems, Petition of City of Richardson Texas, Order, 16 FCC Rcd 18987 (Oct. 17,2001) ("Richardson Order")

<sup>&</sup>lt;sup>9</sup> See Verizon Wireless Ex Parte Letter in CC Docket No. 94-102, tiled August 19,2002.

where cost recovery statutes are in place, wherein the PSAPs have funds available to pay for their upgrade expenses as well as the carriers' deployment costs. Western has taken great efforts to communicate with its PSAPs and to work in a teamwork fashion with PSAPs, LECs and other parties involved in the deployment process. Western often finds itself first to deploy Phase I service to each of its requesting PSAPs. This is both challenging and rewarding in that Western must constantly address anomaly issues associated with being the first carrier to deliver new service into a PSAP.

#### **IV.** Phase I Requests

Western has received 223 requests for Phase I service and it is currently delivering Phase I service to 139 of the requesting counties and PSAPs. A complete listing of each of the PSAPs receiving Phase I service from Western is attached as Attachment C. Western is in the process of deploying Phase I service to the 84 counties and PSAPs listed in Attachment D. Approximately, 33% of the outstanding requests for Phase I service have been prevented from being successfully deployed because of LEC-related issues. Without being able to obtain the necessary trunking facilities between its MSC and the LEC selective router, Western is unable to complete its deployment of Phase I service to certain PSAPs.

#### V. Phase II Requests

Western has received nine requests for Phase II service from the following counties and PSAPs:

Wilbarger County, Texas
Minnesota Department of Administration (35 PSAPs)
Pennington County, South *Dakota*Stark County, North Dakota
Buffalo County, Nebraska
Gallatin County, Montana

Midland County, Texas Taylor County, Texas Potter-Randall County, Texas

Western is actively working with each of these PSAPs to asses their readiness along with the readiness of the LEC, and schedule its deployment plans to meet the FCC's requirement. Wilbarger County, Texas and Buffalo County, Nebraska have withdrawn their requests and have chosen to not deploy Phase II service at this time. Western has reached an agreement on an alternative deployment timeline with Pennington County, South Dakota, and Gallatin County, Montana. Additionally, Western has communicated with Stark County, North Dakota and the 911 State Director III Minnesota and raised its concerns about the feasibility of implementing Phase II service by March I, 2003, because of the LEC's inability to deliver critical network infrastructure that supports the delivery of Phase II service. Western is moving forward with its necessary network upgrades, database preparation and handset sales in order to deliver Phase II service to Midland, Taylor, and Potter-Randall Counties in Texas by the FCC's March 1, 2003 deadline, and will do the same in the other states upon PSAP readiness. Overall, Western is pleased to report that its deployment efforts have put it on course to meet the FCC requirements.

#### VI. Conclusion

Western is on schedule to begin providing Phase II service in those areas where the PSAP has completed its necessary equipment upgrades and where the LEC infrastructure, including the ALI database, have been sufficiently upgraded to pass along the Phase II signal Western is preparing to send to the PSAP. A signed and notarized Affidavit supporting this quarterly report is attached in Attachment F.

# Attachment A

WWC Holding Co., Inc. WWC License L.L.C.

WWC Texas RSA Limited Partnership

# Attachment B

**PSAP's Alternative Deployment Agreements** 



October 8, 2002

Ben V. Hess 9-1-1 Director Gallatin County - City of Bozeman Law & Justice Center 615 S. 16th Street, Suite 101 Bozeman, MT 59715

> Re: Alternative Deployment Agreement between Western Wireless Corporation and Gallatin County, Montana Concerning the Implementation of Wireless E911 Phase II Service

#### Dear Mr. Hess:

Western Wireless Corporation ("Western Wireless") and Gallatin County - City of Bozeman ("Gallatin County") are working together to deploy wireless E91 I Phase II service in Gallatin County, Montana pursuant to the rules and orders of the Federal Communication Commission ("FCC"). The parties have had on-going discussions on implementing E911 service following the request for Phase II service submitted to Western Wireless from Gallatin County on April 6.2001, including the meeting that occurred between the parties in Bozeman, Montana on August 20,2002. The parties recognize that the successful deployment of E911 service includes an assessment of the Local Exchange Carrier ("LEC") infrastructure, the capabilities of the Gallatin County Public Safety Answering Point ("PSAP"), a review of the Intrado MPC database, an understanding of the Western Wireless network in Bozeman, Montana and its E911 Phase II solution. and a comprehensive analysis of other Phase II network elements. Consequently, the parties have agreed to a collaborative effort under which they will evaluate the capabilities and readiness of the above-mentioned Phase II network elements to transmit, transport, or receive a Phase II signal consisting of both the ANI and ALI dala elements.

The parties, taking the FCC's E911 deployment rules into account agree to create a Phase 11 deployment plan that will involve mutually agreed upon target dates, timelines, and an alternate deployment schedule for the delivery of E911 service. In so doing, Western Wireless agrees to deem the request for Phase II service submitted to it by Gallatin County as being valid according to the FCC's rules and orders, and likewise, Gallatin County acknowledges that the agreed-upon deployment schedule shall govern the rights and obligations of the parties. The parties desire to work cooperatively to deploy service in good faith according to a schedule that meets the needs of both parties.

The parties also agree lo negotiate a service agreement that governs the deployment, delivery and maintenance of the Phase II service as well as the cost recovery of Phase II service. During the existence of this letter agreement, and the pendency of the on-going deployment process including the negotiation of the service agreement, both parties agree to resolve their differences amongst themselves without involving the FCC or other regulatory agencies. If the parties are unable to resolve their difference, or negotiate an acceptable deployment schedule that is incorporated in a service agreement that governs the deployment, delivery, maintenance, and cost recovery of E911 service by March I, 2003, then either party may terminate this letter agreement by giving 90 days written notice to the other party. Upon termination of this letter agreement, Gallatin County shall resubmit a new E91 I request, and deployment will then be governed by the applicable FCC rules.

WESTERN WIRELESS CORPORATION

Ву:

Vice President, Western Wireless

GALLATM COUNTY - CITY OF

BOZEMAN

By: \_

Ben V. Hess.

9-1-1 Director, Gallatin County



#### October 22,2002

Don Philips Director Emergency Services Communications Center Pennington County 300 Kansas City Street Rapid City, SD 57701-2889

> Alternative Deployment Agreement between Western Wireless Corporation and Pennington County, South Dakota Concerning the

Implementation of Wireless E911 Phase II Service

Dear Mr Philips:

Western Wireless Corporation ("Western Wireless") and Pennington County, South Dakota ("Pennington County") are working rogetha to deploy wireless E91 1 Phase I service in Pennington County, South Dekota pursuant to the rules and orders of the Federal Communication Commission ("FCC"). The parties have had on-ping discussions on implementing E911 service following the request for Phase II service submitted to Western Wireless from the Pennington County Emergency Communications Services Center on April 4,2001, including the meeting that occurred between the parties in Rapid City, South Dekota on June 14,2002. The parties recognize that the successful deployment of E91 1 service includes an assessment of the Local Exchange Carrier ("LEC") infrastructure, the capabilities of the Pennington County Public Safer]. Answering Point ("PSAP"), a review of the Intrado MPC database, an understanding of the Western Wireless petwork in Rapid City, South Dakota and its E911 Phase II solution, and a comprehensive analysis of other Phase II network elements. Consequently, the parties have agreed to a collaborative effort under which they will evaluate the capabilities and readiness of the above-matiand Phase II network elements to transmit, transport, or receive a Phase II signal consisting of both the AVI and ALI data elements.

The parties, taking the FCC's E911 deployment rules into account agree to create a Phase II deployment plan that will involve mutually agreed upon target dates, timelines, and an alternate deployment schedule for the delivery of E91 1 service. In so doing, Western Wireless agrees to sem the request for Phase II service submitted to it by Pennington County as being valid according to the FCC's rules and orders, and likewise, Pennington County acknowledges that the agreed-upon deployment schedule shall govern the rights and obligations of the parties. The parties desire to work cooperatively to deploy service in good faith according to a schedule that meets the needs of both parties.

The parties also agree to negotiate a service agreement that governs the deployment, delivery and maintenance of the Phase II service. During the existence of this letter agreement, and the pendency of the on-going deployment process including the negotiation of the service agreement, both parties agree to resolve their differences amongst themselves without involving the FCC or other regulatory agencies. If the parties are unable to resolve their difference, or negotiate an acceptable deployment schedule that is incorporated in a service agreement that governs the deployment, delivery, maintenance, and cost recovery of E91 1 service by March 1,2003, then either party may terminate this letter agreement by written notice to the other party. Upon termination of this letter agreement, Pennington County shall resubmit a new E911 request, and deployment will then be governed by the applicable FCC rules.

**WESTERN WIRELESS CORPORATION** 

Dy. Do Jandy

Vice President. Western Wireless

PENNINGTON COUNTY

Don Philips.

Director, Pennington County 9-1-1

**Attachment C** 

**PSAPs Receiving Phase I Service** 

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State	County	PSAP Name				Comments
co	ALAMOSA	Colorado State Patrol-Alamosa	Complete	3/26/02	Qwest	Live
co	BACA	Baca County SO	Complete	3/7/02	Qwest	Live
co	CHAFFEE	Chaffee County SO	Complete	3/4/02	Qwest	Live
co	CHEYENNE	Cheyenne County Sheriffs Office	Complete	3/8/02	Qwest	Live
co	CONEJOS	Colorado State Patrol-Alamosa	Complete	3/26/02	Qwest	Live - Secondary PSAP to Alamosa.
co	COSTILLA	Colorado State Patrol-Alamosa	Complete	3/26/02	Qwest	Live - Secondary PSAP to Alamosa.
co	CROWLEY	Crowley County	Complete	3/22/02	Qwest	Live
CO	ELBERT	Elbert County Sheriff's Office	Complete	4/22/02	Qwest	Live
co	KIOWA		No Sites		Qwest	No cell sites in this county
СО	KIT CARSON	Kit Carson Co. Dispatch Board	Complete	3/8/02	Qwest	Live
co	LAS ANIMAS	Trinidad PD	Complete	4/17/02	Qwest	Live
CO	MINERAL	Colorado State Patrol-Alamosa	Complete	3/26/02	Qwest	Live - Secondary PSAP to Alamosa.
co	OTERO	La Junta PD	Complete	3/20/02	Qwest	Live
CO	PROWERS	Prowers Co. Combined Comm.	Complete	3/4/02	Qwest	Live
CO	RIO GRANDE	Colorado State Patrol-Alamosa	Complete	3/26/02	Qwest	Live - Secondary PSAP to Alamosa.
СО	SAGUACHE	Colorado State Patrol-Alamosa	Complete	3/26/02	Qwest	Live - Secondary PSAP to Alamosa.
IA	CRAWFORD	Crawford County SO	Complete	9/19/01	Qwest	Live
- IA	HARRISON	Harrison County SO	Complete	1/8/02	Qwest	Live
IA .	MONONA	Monona County SO	Complete	9/19/01	Qwest	Live
IΑ	SHELBY	Shelby County EMA 9-1-1	Complete	1/8/02	Qwest	Live
- IA	WOODBURY	Woodbury County SO	Complete	9/17/01	Qwest	Live
KS	RILEY	Riley County 9-1-1	Complete	7/9/02	SWBT	Live
NĎ	DUNN	Stark-Dunn E9-1-1	Complete	4/3/02	Qwest	Live
ND	STARK	Stark-Dunn E9-1-1	Complete	4/3/02	Qwest	Live
NE	BOYD	Boyd County Sheriff	No Sites		Qwest	No cell sites in this county
NE	BUFFALO	Buffalo County Sheriffs Office	Complete	3/22/02	Qwest	Live
NE	CEDAR	Cedar County Sheriffs Office	Complete	6/25/02	Qwest	Live
NE	CLAY		No Sites		Qwest	No cell sites in this county
NE.	CUMING	Cuming Co. E9-1-1 Comm.	Complete	6/25/02	Qwest	Live
NE	CUSTER	Custer County Sheriffs Dept.	Complete	2/22/02	Qwest	Live
NE	DAWSON	Dawson County Sheriffs Office	Complete	7/26/02	Qwest	Live
NE	DAKOTA	Dakota County Comm.	Complete	9/17/01	Qwest	No calls route to this PSAP
NE	HALL	Grand Island-Hall County	Complete	7/26/02	Qwest	Live
NE	HOWARD	Howard County Comm. Center	Complete	7/16/02	Qwest	Live
NE	MERRICK	Merrick County Sherrifs Office	Complete	7/16/02	Qwest	Live
SD	PENNINGTON	Pennington County ESCC	Complete	Mar-01	Qwest	Live
TX	ANDIREWS	Andrews County Sheriff's Office	Complete	5/20/02	SWBT	Live
TX	ARCHER	Archer SO	Complete	7/23/02	SWBT	Live
TX	ARMS TRONG		No Sites		SWBT	No cell sites in this county
TX	BAILEY	Muleshoe PD	Complete	10/1/01	Verizon	Live
TX	BAYLOR	Baylor SO	Complete	1/31/01	SWBT	Live

TX	BORDEN		No Sites		SWBT	No cell sites in this county
TX	BREWSTER	Alpine PD	Complete	1/31/01	SWBT	Live
TX	BRISCOE	Tulia PD (Swisher County)	Complete	1/31/01	SWBT	Live-calls routed to Swisher County
TX	CALLAHAN	Callahan SO	Complete	12/21/00	SWBT	Live
TX	CARSON	Carson SO	Complete	1/31/01	SWBT	Live
TX	CASTRO	Castro SO	Complete	1/31/01	SWBT	Live
TX	CHILDRESS	Childress PD	Complete	1/31/01	SWBT	Live
ŤΧ	COCHRAN	Cochran SO	Complete	9/5/01	Valor	Live
TX	COKE	West Coke Co. Nursing Home	Complete	4/5/02	GTE	Live
TX	COLLINGSWORTH	Collinsworth SO	Complete	1/31/01	SWBT	Live
ŤΧ	CRANE	Crane Police Department	Complete	1/31/01	SWBT	Live
TX	CROCKETT	Crockett SO	Complete	3/8/02	GTE	Live
TX	CROSBY	Crosby SO	Complete	9/5/01	SWBT	Live
TX	CULBERSON	Culberson SO	Complete	12/6/01	SWBT	Live
TX	DALLAM	Dalhart PD	Complete	1/31/01	SWBT	Live
TX	DALLAM	Dallam SO	Complete	1/31/01	SWBT	Live
ΤX	DAWSON	Lamesa PD	Complete	1/22/02	SWBT	Live
TX	DEAF SMITH	Hereford PD	Complete	1/31/01	SWBT	Live
TX	DICKENS	Dickens SO	Complete	10/4/01	GTE	Live
TX	DONLEY	Donley SO	Complete	11/19/01	SWBT	Live
TX	ECTOR	Odessa Communications Center	Complete	9/28/01	SWBT	Live
TX	FANNIN	Bonham PD	Complete	8/27/02	SWBT	Live
TX	FISHER	Fisher SO	Complete	12/20/00	SWBT	Live
TX	FLOYD	Floyd SO	Complete	9/5/01	SWBT	Live
TX	GAINES	Gaines County Sheriffs Office	Complete	1/31/01	SWBT	Live
TX	GARZA	Garza SO	Complete	10/5/01	GTE	Live
TX	GLASSCOCK	Martin County Sheriffs Office	Complete	3/8/02	SWBT	Live
TX	GRAY	Pampa PD	Complete	1/31/01	SWBT	Live
TX	HALE	Hale SO	Complete	9/5/01	SWBT	Live
TX	HALL		No Sites		SWBT	No cell sites in this county
TX	HANSFORD	Hansford SO	Complete	1/31/01	SWBT	Live
TX	HARDEMAN	Hardeman County SO	Complete	7/23/02	SWBT	Live
TX	HARTLEY	Dalhart PD (Dallam County)	Complete	1/31/01	SWBT	Live-calls routed to Dallam County
TX	HASKELL	Haskell SO	Complete	12/20/00	SWBT	Live
TX	HEMPHILL	Hemphill SO	Complete	1/31/01	SWBT	Live
TX	HIDALGO	Alamo PD	Complete	1/31/01	SWBT	Live
TX	HIDALGO	Donna PD	Complete	1/31/01	SWBT	Live
TX	HIDALGO	Edinburg PD	Complete	1/31/01	SWBT	Live
TX	HIDALGO	Hidalgo PD	Complete	1/31/01	SWBT	Live
TX	HIDALGO	Hidalgo SO	Complete	1/31/01	SWBT	Live
TX	HIDALGO	McAllen PD	Complete	1/31/01	SWBT	Live
TX	HIDALGO	Mission PD	Complete	1/31/01	SWBT	Live
TX	HIDALGO	Palmview PD	Complete	1/31/01	SWBT	Live
TX	HIDALGO	Phan PD	Complete	1/31/01	SWBT	Live

	1004100	111 1 20		1/24/04 T	CWDT	Live
TX	HIDALGO	Weslaco PD	Complete	1/31/01	SWBT	
TX	HOCKLEY	Levelland PD	Complete	10/3/01	SWBT	Live
TX	HOWARD	Howard Co. 9-1-1 Comm. District	Complete	11/1/01	SWBT	Live
TX	HUDSPETH	Hudspeth County SO	Complete	3/19/02	SWBT	Live
TX	HUNT	Greenville PD	Complete	8/21/02		Live
TX	HUNT	Hunt County SO	Complete	8/21/02	SWBT	Live
TX	HUTCHINSON	Borger PD	Complete	1/31/01	SWBT	Live
TX	IRION	Irion County SO	Complete	3/8/02	GTE	Live
TX	JEFF DAVIS	Jeff Davis County SD	Complete	1/31/01	SWBT	Live - calls sent to Presidio and Culberson Co.
TX	JONES	Jones County Comm Center	Complete	12/20/00	SWBT	Live
TX	KENT	Calls routed to Dickens Co.	Complete	10/4/01	SWBT	Live-Kent Co. routes to Dickens Co.
TX	KING	Calls routed to Dickens County	Complete	10/4/01	SWBT	Live-King Co. routes to Dickens Co.
TX	KNOX	Knox Central Dispatch	Complete	12/20/00	SWBT	Live
TX	LAMAR	Paris PD	Complete	7/26/02	SWBT	Live
TX	LAMB	Littlefield PD	Complete	9/5/01	Valor	Live
TX	LOVING		No Sites		SWBT	No cell sites in this county
TX	LUBBOCK	Lubbock PD	Complete	2/28/01	SWBT	Live
TX	LYNN	Lynn Co. Sheriffs Office	Complete	10/3/01	GTE	Live
TX	MARTIN	Martin County Sheriffs Office	Complete	1/31/01	SWBT	Live
TX	MIDLAND	Midland Emerg. Comm. District	Complete	10/25/01	SWBT	Live
TX	MITCHELL	Colorado City PD	Complete	12/21/00	SWBT	Live
TX	MOORE	Moore SO	Complete	1/31/01	SWBT	Live
ΤX	MOTLEY	Floyd County SO	Complete	1/31/01	SWBT	Live-Briscoe Co. routes to Swisher Co.
TX	NOLAN	Sweetwater PD	Complete	1/17/01	SWBT	Live
ΤX	OCHILTREE	Perryton PD	Complete	1/31/01	SWBT	Live
TX	OLDHAM	Oldham SO	Complete	1/31/01	SWBT	Live
TX	PARMER	Friona PD	Complete	1/31/01	SWBT	Live
ΤX	PECOS	FT Stockton PD	Complete	1/31/01	SWBT	Live
TX	POLK	Polk County Sheriffs Office	No Sites		SWBT	No cell sites in this county
TX	PRESIDIO	Presidio SO	Complete	1/31/01	SWBT	Live
TX	REAGAN	Reagan SO	Complete	3/8/02	GTE	Live
TX	REEVES	Pecos Police Department	Complete	2/1/02	SWBT	Live
TX	ROBERTS	Roberts County SO	Complete	3/8/02	SWBT	Live
TX	SCHLEICHER	Schleicher County SO	Complete	5/21/02	Verizon	Live
TX	SCURRY	Scurry SO	Complete	12/20/00	SWBT	Live
TX	SHACKELFORD	Shackelford County SO	Complete	1/31/01	ŞWBT	Live
TX	SHERMAN	Sherman County SO	Complete	5/1/02	SWBT	Live
TX	STEPHENS	Breckenridge PD	Complete	3/8/02	SWBT	Live
TX	STERLING	Country Doctors Inn	Complete	3/8/02	Verizon	Live
TX	STONEWALL	Stonewall SO	Complete	12/21/00	SWBT	Live
TX	SUTTON	Sutton County SO	Complete	3/8/02	Verizon	Live
TX	SWISHER	Tulia PD	Complete	1/31/01	SWBT	Live
TX	TAYLOR	Abilene PD	Complete	5/31/01	SWBT	Live

TX	TERRY	Brownfield PD	Complete	10/3/01	Valor	Live
TX	THROCKMORTON	Throckmorton SO	Complete	1/17/01	ŞWBT	Live
TX	TOM GREEN	San Angelo Comm Center	Complete	4/2/02	Verizon	Live
TX	UPTON	Upton County SO	Complete	1/31/01	SWBT	Live
TX	WARD	Monahans Police Department	Complete	1/31/01	SWBT	Live
TX	WHEELER	Wheeler SO	Complete	1/31/01	SWBT	Live
TX	WILBARGER	Vemon PD	Complete	1/31/01	SWBT	Live
TX	WINKLER	Kermit Police Department	Complete	1/31/01	SWBT	Live
TX	YOAKUM	Denver City PD	Complete	10/3/01	Valor	Live
TX	YOUNG	Young SO	Complete	1/31/01	SWBT	Live

# **Attachment D**

**PSAP Phase I Requests Currently Being Deployed** 

#### E911 Phase I Deployments In Progress

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State	County	PSAP Name				Connects
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AR	COLUMBIA LAFAYETTE	Columbia Central Dispatch	In Process	SWBT	Pine Bluff	PSAP must complete call routing.
AR	BENT	Lafeyette County SO	In Process	SWBT	Pine Bluff	Deployment is pending completion and testing of trunks.
CO	DICKINSON	Bent County Sheriffs Office	n Process	Qwest	Puebio	PSAP must complete call routing
KS	SALINE	Dickinson Co. Emerg. Comm. Center	In Process	SWBT	Topeka Jackson	Deployment is pending ordering, delivery and testing of trunks.
KS MN	BLUE EARTH	Salina Police Department	In Process	SWBT	Topeka Jackson	Deployment is pending ordering, delivery and testing of trunks.
MN	BROWN	Blue Earth Co. Emergency Services	In Process	IESMCI	Kasson	PSAP must complete call routing.
MN	CHIPPEWA	Brown County SO	In Process	IES	Ruthlon	Deployment to be scheduled in November 2002.
MN.	CLAY	Chippewa County SO	In Process	IES/MCI	Hutchison	Deployment to be scheduled in November 2002.
MN	CLEARWATER	Clay Co. Law Enforcement Center	In Process	Qwest	Fargo	PSAP must complete call routing.
MN	COTTONWOOD	Clearwater County SO	In Process	IES	Erskine	PSAP must complete call routing.
	1	Cottonwood County SO	In Process	IES	Ruthton	Deployment to be scheduled in November 2002.
MN	JACKSON	Jackson Co. Sheriffs Department	In Process	IES	Ruthton	Deployment to be scheduled in November 2002.
MN	KANDIYOHI	Kandiyohi Co. Sheriffs Department	In Process	IES/MCI	Hutchison	PSAP must complete call routing
MN	KITTSON	Kittson County	In Process	IES	Erskine	Deployment is pending ordering, delivery and testing of trunks.
MN	LAC QUI PARLE	LAC QUI PARLE Sheriffs Office	tn Process	IES	Ruthion	PSAP must complete call routing.
MN		Lake of the Woods Co. Sheriff	In Process	IËS	Erskine	Deployment is pending ordering, delivery and testing of trunks.
	LE SUEUR	Le Seuer PD	In Process	IES/MCI	Kasson	PSAP must complete call routing.
MN	LINCOLN	Marshall District MN State Patrol	In Process	MCVQwest	Rochester	PSAP must complete call routing.
MN	MAHNOMEN	Lyon Co. Sheriffs Office & MRSP	In Process	IES/MCI	Ruthton	Deployment to be scheduled in November 2002.
MN	MARSHALL	Mahnomen Co. Sheriffs Department Marshall Co. Sheriffs Office	In Process	IES	Erskine	PSAP must complete call routing.
MN	MARTIN	Martin Co. Law Enforcement Center	In Process	IES	Erskine Ruthlon	Deployment is pending ordering, delivery and testing of trunks.
MN	MCLEOD	Hutchinson PD	In Process	IES		Deployment to be scheduled in November 2002.
MN	MCLEOD	Mcleod Co. Sheriffs Department	In Process	IES/MCI	Hutchison	PSAP must complete call routing.
MN	MEEKER	Meeker Co. Sheriffs Department	In Process	IES/MCI	Hutchison	PSAP must complete call routing.
MN	MURRAY	Marshall District MN State Patrol	In Process	IES/MCI	Hutchison Ruthton	PSAP must complete call routing.
MN	NICOLLET	Nicolle! Co. Sheriffs Department	In Process	IES	Kasson	PSAP must complete call routing.
MN	NOBLES	Nobles Co. Sheriffs Department	In Process	IES/MCI	Ruthlon	Deployment to be scheduled in November 2002.  Deployment to be scheduled in November 2002.
MN	NORMAN	Norman Co. Sheriffs Department	In Process	IES/MCI	Erskine	
MN	PENNINGTON	Pennington Co. Sheriffs Department	in Process	IES	Erskine Erskine	Deployment is pending ordering, delivery and testing of trunks.  PSAP must complete call routing.
MN	PIPESTONE	Marshall District MN State Patrol	In Process	MCI/Qwest	Rochester	PSAP must complete call routing.  PSAP must complete call routing.
MN	POLK	Polk Co. Emergency Service	In Process	IES	Erskine	PSAP must complete call routing.  PSAP must complete call routing.
MN	RED LAKE	Red Lake Co. Sheriffs Dept.	In Process	IÉS	Erskine	No cell sites in this county.
MN	REDWOOD	Redwood Co. Sheriff & MRSP	No Sites In Process	IÉS	Ruthton	Deployment to be scheduled in November 2002.
MN	RENVILLE	Renville Co. Sheriff	In Process	IES/MCI	Hulchison	PSAP must complete call routing.
MN	ROCK	Marshall District MN State Patrol		MCI/Qwest	Rochester	PSAP must complete call routing.
	ROSEAU	Roseau County Sheriffs Department	In Process	IES	Erskine	Deployment is pending ordering, delivery and testing of trunks.
MN	SIBLEY	Sibley County Sheriffs Department	In Process	IES/MCI	Hutchison	PSAP must complete call routing.
MN	WATONWAN	Watonwan Co. Sheriffs Dept.& MSRP	In Process	Qwest	Rochester	PSAP must complete call routing.  PSAP must complete call routing.
MN	YELLOW MEDICINE	Marshall District MN State Patrol		Qwest	Rochester	PSAP must complete call routing.  PSAP must complete call routing.
MT	GALLATIN	Gallatin CoCity of Bozeman 9-1-1	In Process	Qwest	Billings	PSAP not able to receive service until it resolves contract issues with Qwest
MT	GLACIER	Glacier Co. Sheriffs Office	Not Deployable	Qwest	Billings	PSAP not able to receive service until it resolves contract issues with Qwest
MT	MISSOULA	Missoula Co. 9-1-1 Center	Not Deployable	Qwest	Billings	PSAP not able to receive service until if resolves contract issues with Qwest

#### E911 Phase I Deployments in Progress

Live festing is scheduled for Movember 2002.	Среуелле	Gwest.	azesoor¶ nl	Casper Public Safety Comm. Center	ANOSITAN	٨M
Live testing is scheduled for November 2002.	Среуелле	Cwest	2290009 nl	Albany Co. Records and Comm.	YNABJA	AM.
Deployment is pending ordering, delivery and testing of bunks.	Whitehouse	nozna√	ln Process	Wood Co. SO	MOOD	ΧĹ
Deployment to be scheduled in Movember 2002.	boowteel TilentA	TEWS	In Process	Shатгоск PD	WHEELER	XT
Deloyment is pending, delivery and testing of trunks.	9suodejidW	NoznaV	sasson¶ nl	Upshur County SO	AUHSAU	XT
Deloyment is pending ordering, delivery and lesting of trunks.	Longview Greggton	TBWS	assoon9 nl	Mt. Pleasant PD	SUTIT	XT
Deployment is pending ordering, delivery and lesting of trunks.	Whitehouse	noznaV	ssecory nl	Clarksville PD	RED RIVER	XT
Deployment is pending ordering, delivery and testing of trunks.	Amarillo Fleetwood	SWBT	assoon9 nl	Randali Co. Sheriffs Department	RANDALL	XT
Solower is pending orbering, delivery and testing of bunks.	Cash	nozneV	azecon9 ni	Rains SO	SNIAA	XT
athord to gaited has meviet gained as the section of the manufacture o	Amanilo Fleetwood	TBWS	2280079 nl	Amanilo Police Department	POTTER / RANDALL	XT
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Sahrut to gaitest perveng adelivery and testing of trunks.	Whitehouse	uozue∧	In Process	O2 smoM	SIRROM	XT
Deployment is pending ardeivery and lesting of trunks.	Longview Greggton	Taws	azesoor9 nl	OS noneM	NOIRAM	XT
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Salvant is pending ordering, delivery and testing or branks.	Whitehouse	uoz⊔e∧	<b>226000</b> 9 nl	Franklin SO	FRANKLIN	ΧŢ
PARP is not enhanced. No data links to ALI and cannot receive and utilize service.	Wichita Falls	Taws	Not Deployable	OS namebraH	- GRAO1	ΧL
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PAPP is not enhanced. No data links to ALI and cannot receive and utilize service.	elle 7 shirtoiW	SWBT	Not Deployable	Paducha City Hall	COTILE	ΧT
Deployment is pending ordering, delivery and testing of trunks.	Longview Greggton	nozinsV	In Process	OS :00 sse0	CV22	XT
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APP not able to receive service until in resolves contract issues with DARSK	Sloux Falls	Owest	22 <b>83</b> 0019 RI	Moody Co. Sheriffs Department	MOODY	as
PAP not able to receive service until it resolves contract issues with Owest	Sioux Falls	)sawO	zzeoo19 nl	Minnehaha Co. Metro Comm.	MINUEHAHA	as
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PAP not able to receive service until it resolves contract insules with Owest	Sioux Falls	tsawD	2250019 nl	Lawrence Co. Sheriffs Office	FYMBENCE	as
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САР must complete cell routing.	Council Bluffs	ISBWD	In Process	Washington Co. Communications	WASHINGTON	<u> 3</u> N
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S002 reduibed in November 2002.	bnski bnerð	IsswD	ba Process	Gothenburg Police	DAWSON	NE
SAP must complete call routing.	Grand Island	129WD	In Process	Chase County 9-1-1	CHASE	ЭN
Partial complete call routing.	<del></del>	19J IA	Not Deployable	Cass Co. Sheriff's Department	CY22	3N
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Attachment E

**PSAP Phase II Requests** 

	No cell sites in Bertrami County.	PSAP request is invalid because the PSAP is not able to receive and utilize the service due to LEC infrastructure unpreparedness.	PSAP request is invalid because the PSAP is not able to receive and utilize the service due to LEC infrastructura unpreparedness.	PSAP request is invalid because the PSAP is not able to receive and utilize the service due to LEC infrastructure unpreparedness.	PSAP request is evelable because the PSAP is not able to receive and utilize the service due to LEC inflastructure unpreparedness.	PSAP request is invalid because the PSAP is not able to receive and utilize the service due to LEC infrastructure unpreparedness.	PSAP request is inveited because the PSAP is not acte to receive and utilize the service due to LEC infrastructure unpreparediress.	PSAP request is investible because the PSAP is not able to receive and utilize the service the to LEC infrastructure unpreparedness.	PSAP request is invalid because the PSAP is not able to receive and utilize the service due to LEC intrastructure unpreparedness.	PSAP request is invated because the PSAP is not able to receive and utilize the service due to LEC intrastructure unpreparedness.	PSAP request is invalid because the PSAP is not able to receive and utilize the service due to LEC infrastructure unpreparedness.	PSAP request is invalid because the PSAP is not able to receive and utilize the service due to LEC infrastructure urpreparedness.	PSAP request is inveit because the PSAP is not able to receive and utilize the service due to LEC infrastructure underparedress.	PSAP request is invalid because the PSAP is not able to receive and utilize the service due to LEC infrastructure unpreparedness.	PSAP request is invalid because the PSAP is not able to receive and utilize the service due to LEC sinastructure unpreparadiress.	PSAP request is invated because the PSAP is not able to receive and utitize the service due to LEC initiastructure unpreparedness.	PSAP request is awaiid because the PSAP is not able to receive and utilize the service due to LEC interstructure unpreparedness.	PSAP request is invalid because the PSAP is not able to receive and utilize the service due to LEC infrastructure unpreparathess.	PSAP request is investible cause the PSAP is not able to receive and utilize the service due to LEC interstructure unpreparedmess.	PSAP request is greated because the PSAP is not abbe to receive and utilize the service due to LEC infrastructure unpreparadress.	PSAP request is investe because the PSAP is not atte to receive and utilize the service due to LEC infrastructure unpreparationess.	PSAP request is invalid because the PSAP is not liable to receive and utilize the service due to LEC infrastructure unpreparedness.	PSAP request is invalid because the PSAP is not able to receive and utilize the service due to LEC infrastructure unproperedness.	PSAP request is inveited because the PSAP is not inhie to receive and unities the service due to LEC infrastructure unpreparedness.	PSAP request is unvalin because the PSAP is not able to receive and utilize the service due to LEC infrastructure unpreparedness.	PSAP request is invalid because the PSAP is not able to receive and utilize the service due to LEC infrastructure unpreparedness.	Table Todays Billings are properly to be a second to the properly of the prope	PSAP requests invalid because the PSAP is not able to receive and utilize the service due to EC infrastructure appearances.	PSAP request is invalid because the PSAP is not able to receive and utilize the service due to LEC infrastructure unperparedness.	PSAP request is invekt because the PSAP is not able to receive and utilize the service due to LEC infrastructure ungreparadness.	PSAP request is evoked because the PSAP is not able to receive, and utilize the service out to LEC infrastructure unpreparedness.	PSAP request is invalid because the PSAP is not after to receive and utilize the service due to LEC inhasbucture unpreparadness.	PSAP request is invalid because the PSAP is not able to receive and utilize the service due to LEC infrastructure ungreparedness.	PSAP request is invalid because the PSAP is not able to receive and utilize the service one to LEC infrastructure unprependiness.	PSAP and Western Windess have signed an Attennative Deployment Agreement	PSAP request is invalid because the PSAP is not able to recover and utilize the service due to LEC infrastructure unpreparedness.	Request was withdrawn on 10-31-02	PSAP and Western Wreless have signed an Allemative Deployment Agreement	Phase II deployment planning meeting with the PSAP is substitled to November 7, 2002.	Deployment plans are progressing on schedule	Deployment plans are progressing on achedule	Deployment plans are progressing on schedule	Request was withdrawn on 5-24-02
Secremental Views	Turtle River	Ruthton	Hutchison P.	Fargo		Pauthton P.S	Ruthton	Hufehison PS	Erskine	Ruthton	Erstime P?	Kasson PS		Ruthton	Erskine	Erskine Pt	Ruthton Pt	Hutchison P	Hutchison P?		Ruthton		1		Ī	Rochester		Γ	Hutchison	Rochester P.	Erstine	Hutchison	Rochester	Rochester	Billings		Grand Island R.	P. Pard C.	Odessa Emerson Pr	Amarillo Fleetwood D	Amarillo Fleetwood D	╗	Wichita Falls/Lamar R
	ES	ES	ESWCI	Owes	ES	Sa	ES	IESMCI	les	ES	ES	IESMCI	MCI/Owest	ESMC	ES	ES	ES	ESWCI	ESMCI	ESMC	<u>8</u>	IES/MCi	ESMC	ES	ES	MCI/Qwesi	3 2	3 2	IESWCI	MCI/Owest	IES	IESAMCI	Owest	Owest	Sawo	Çeest	Owest	Owes	SWBT			_	SWBT
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	Requested	Requested	Requested	Requested	Requested	Requested	Requested	Requested	Requested	Requested (	Requested	Requested	Requested	Requested	Requested	Requested	Requested	Requested	Requested	Requested	Requested	Requested	Requested	Requested	Requested	Requested	Pagestad	Requested	Requested	Requested	Requested	Requested	Requested	Requested	Requested	Requested	Withdrawn	Reguested	Requested	Requested	Requested	Requested	Withdrawn
	Betrami County Law Enforcement Center	Brown County SO	Chippewa County SO	Clay County Law Enforcement Center	Clearwater County SO	Coltonwood County SO	Jackson County Sheriffs Department	Kandiychi County Sheriffs Department	Kittson County	LAC CIVI PARLE Sheriffs Office	Lake of the Woods County Sheriff	Le Seuter PD	Marshell District MN State Patrol	Lyon County Sheriffs Office a unsp	Mahmomen County Sheriffs Department	Marshall County Shariffs Office	Marian County Law Enforcement Center	Hulchinson PD	Moteod County Sheriffs Department	Moeker County Sheriffs Department	Marchell District MN State Patrol	Nicollet County Shariffs Department	Nobles County Sheriffs Department	Norman Courty Sheriffs Department	Pennington County Sheriffs Department	Marshall District MN State Patrol	Red Lake Count Shorts Department	Redwood Courty Sheriff a serse	Renville County Sheriff	Marshall District MN State Patrol	Roseau County Sheriffs Department	Sibley County Sheriffs Department	Watonwan Co. Sheriffs Dept. & MRSP	Marshall District Mrv State Patrol	Gallatin County-City of Boxeman 9-1-1	Start-Dum E9-1-1	Buffelo County Sheriffs Office	Pennington County ESCC	Midland Emergency Comm. District	Potter County Sheriffs Department	Randall County Sheriffs Department	Ablene PD	Vernon PD
County	BELTRAMI	BROWN	CHIPPEWA	CLAY	CLEARWATER	соттомимоор	JACKSON	KANDIYOHI	KITISON	LAC QUI PARLE	LAKE OF THE WOODS	LE SUEUR	LINCOLN	CYON	MAHNOMEN	MARSHALL	MARTIN	MCLEOD	MCLEOD	MEEKER	MURRAY	NICOLLET	NOBLES	NORMAN	PCMINGLON	POLK	RED LAKE	REDWOOD	RENVILLE	ROCK	ROSEAU	SIBLEY	WATONWAN	YELLOW MEDICINE	GALLATIN	STARK	BUFFALO	PENNINGTON	MIDLAND	POTTER	RANDALL	IAYLOH	WILBARGER
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Attachment F

Affidavit

#### Beforethe Federal Communications Commission Washington, D.C. 20554

In the metter of	)	
Revision of the Commission's Rules To Ensure Compatibility with Enhanced 911	}	<b>CC</b> Docket <b>No. 94-102</b>
Emergency Calling Systems	}	

#### **AFFIDAVIT OF GENE DEJORDY**

- 1. My name Is Gene DeJordy. i am over the age of 21. of sound mind, and competent to testify as to the matters stated herein. My position with Western Is Vice President of Regulatory Affairs. In that position, I assisted In the preparation and completion of the Enhanced 911 Phase If Quarterly Report of Western Wireless Corporation.
- 2. Western is engaged in deploying E911 Phase I and Phase II service throughout many counties in the western United States. It has already successfully deployed Phase I service in over 130 counties. This Report is a correct and accurate assessment of the stabs of each of the requests for E911 service that Western has received.
- 3. Western b on schedule to meet its Phase II deployment obligations In the counties identified in this Report. Furthermore, Western is aware of PSAP and LEC related issues which might prove to be obstacles preventing the deployment of Phase II service in the additional counties identified in this Report.

Further Afflant sayeth not.

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Gene DeJordy

Swom and Subscribed to before methls / st day of November, 2002 to

certify which witness my hand.

Notary Public In end for the State of Waahington

My Commission Expires: **5**~3(-03)